

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,**

Defendants.

Case No.: 7:20-cv-00947-JD

MOTION TO AMEND COMPLAINT

Plaintiffs, Jane Does 1-9, by and through their undersigned counsel, respectfully moves this Court for leave to amend their Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure. Plaintiffs request leave to amend their Complaint to reflect newly discovered information that is relevant to the previously plead facts contained within Plaintiffs operative Complaint. The additional claims brought against Defendants arise out of the facts and circumstances contained within this matter and as such, are brought within the applicable statute of limitations. The Plaintiffs conferred with Defendants regarding this Motion and Defendants could not provide consent.

A copy of the proposed Fifth Amended Complaint is attached hereto as Exhibit 1. In support of this Motion, Plaintiffs rely on the statements herein, the pleadings filed in this case, the rules of Court and such other matters as may be properly presented to the Court.

Therefore, the Plaintiffs respectfully requests this Court enter an Order granting Plaintiffs' Motion to file a Fifth Amended Complaint.

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WE SO MOVE:

BELL LEGAL GROUP, LLC

s/J. Edward Bell, III

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November 8, 2021